

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
–Florence Division–**

People for the Ethical Treatment of Animals, Inc.,  
*et al.*,

*Plaintiffs,*

v.

Kathleen Futrell, *et al.*,

*Defendants.*

Civil Action No. 4:22-cv-01337-JD

**NOTICE OF PLAINTIFFS’ RULE 26(a)(2)(B) DISCLOSURES**

In accordance with the Court’s Amended Conference and Scheduling Order, ECF No. 32, Plaintiffs People for the Ethical Treatment of Animals, Inc. (“PETA”), Matthew Howard, and Lexie Jordan (“Plaintiffs”) submit this notice and identify the following expert witnesses who Plaintiffs expect to call at trial:

1. Darren E. Minier  
9777 Golf Links Road, Oakland, CA 94605  
(510) 746-7165
2. Kim K. Haddad  
1961 Saint Francis Way, San Carlos, CA 94070  
(650) 619-0628
3. Valerie A. Johnson  
736 Wilson Road, East Lansing MI 48824  
(517) 353-4957
4. Wm. Kirk Suedmeyer,  
6800 Zoo Drive, Kansas City, MO 64132  
(816) 595-1261

5. Jesse Donahue  
7400 Bay Road, University Center, MI 48710  
(989) 964-4000

Plaintiffs certify that its expert witness disclosures, which include all information required by Fed. R. Civ. P. 26(a)(2)(B) and were prepared and signed by the experts listed above, were disclosed to counsel for Defendants Kathleen Futrell, Jeff Futrell, and Austin Futrell on May 3, 2023.

Dated: May 3, 2023

/s/ Stacie C. Knight  
Stacie C. Knight  
S.C. Bar No. 77968  
D.C. No. 10411  
WINSTON & STRAWN LLP  
300 South Tryon Street, 16th Floor  
Charlotte, NC 28202  
(704) 350-7700; (704) 350-7800 (fax)  
sknight@winston.com

Jonathan Brightbill\*  
Kyllan Gilmore\*  
Sharon Lin\*  
WINSTON & STRAWN LLP  
1901 L Street NW  
Washington, DC 20036  
(202) 282-5855; (202) 282-5100 (fax)  
jbrightbill@winston.com  
kgilmore@winston.com  
slin@winston.com

Caitlin Hawks\*  
Asher Smith\*  
Zeynep Graves\*  
Aaron Frazier  
Tala DiBenedetto  
PETA FOUNDATION  
1536 16th Street NW  
Washington, DC 20036  
(323) 210-2263; (213) 484-1648 (fax)  
CaitlinH@petaf.org

AsherS@petaf.org  
ZeynepG@petaf.org  
AaronF@petaf.org  
TalaD@petaf.org

\*Pro hac vice applications to be submitted

*Counsel for Plaintiffs*